

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UMG RECORDINGS, INC, CAPITOL
RECORDS, LLC, CONCORD BICYCLE
ASSETS, LLC, CMGI RECORDED MUSIC
ASSETS LLC, SONY MUSIC
ENTERTAINMENT, and ARISTA MUSIC

Plaintiffs,

v.

INTERNET ARCHIVE, BREWSTER
KAHLE, KAHLE/AUSTIN FOUNDATION,
GEORGE BLOOD, and GEORGE BLOOD,
L.P.

Defendant.

Civil Action No. 23-cv-7133

**DECLARATION OF GREGG GOLDMAN IN SUPPORT OF PLAINTIFFS’
OPPOSITION TO DEFENDANTS’ MOTION TO TRANSFER VENUE**

I, Gregg Goldman, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am Executive Vice President of Business & Legal Affairs at Concord Label Group. In my capacity as in-house counsel for Concord Label Group, among other things, I manage and supervise litigation for Plaintiffs Concord Bicycle Assets, LLC (“CBA”) and CMGI Recorded Music Assets LLC (“CMGI”).

2. I submit this declaration in support of Plaintiffs’ Opposition to Defendants’ Motion to Transfer Venue. I have knowledge of the facts stated herein based on personal knowledge and my review of the documents and other items referenced herein. If called upon to do so, I am able to testify competently to the matters set forth below.

3. CMGI's headquarters and principal places of business are located at 10 Lea Avenue, Suite 300, Nashville, TN 37210.

4. CMGI has substantial ties to New York. There are 136 total employees at CMGI's office in New York, New York. CMGI's employees in New York perform substantial operations, including Corporate, Publishing, Recorded Music and Shared Services.

5. CMGI does not maintain offices or have any employees in San Francisco, California.

6. CBA has no offices or employees of its own; all of its functions and operations are handled by CMGI.

7. I, as CBA and CMGI's witness identified in Plaintiffs' Initial Disclosures, am located in Nashville, Tennessee.

8. I regularly travel to New York for purposes related to my employment at Concord Label Group. I do not regularly travel to San Francisco for purposes related to my employment at Concord Label Group. Travelling to New York is significantly more convenient for me than travelling to San Francisco.

I declare under penalty of perjury that the foregoing is true and correct.



GREGG GOLDMAN

Executed on this 13th day of November 2023.